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May 10, 1999

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tn. 37243-0505

99-00342

Re: ONEPOINT Communications, Georgia, LLC-Intralata Toll Dialing Parity Plan

Dear Mr. Waddell:

I am writing on behalf of my client, ONEPOINT Communications, Georgia, LLC ("ONEPOINT") in response to the Tennessee Regulatory Authority letter of April 29, 1999 concerning the requirement of the FCC for resellers to file Intralata toll dialing parity plans with the TRA.

At the present time, ONEPOINT is authorized by the TRA in Tennessee, but does not operate in Tennessee. However, my client plans to begin operations in the near future. Enclosed with this letter is the Intralata toll dialing parity plan for ONEPOINT (with 13 copies). In addition, I enclose our firm check in the amount of \$25.00 in payment of the required filing fee.

Please mark the extra enclosed copy of this letter and plan as filed and return to me. If you have any questions about the plan, you may contact me at the telephone number listed in the letterhead or you may contact Mr. Dick Kolb, the Company's representative at 847-374-3700.

Very truly yours,

*Daniel R. Loftus*  
Daniel R. Loftus

## INTRALATA TOLL DIALING PARITY PLAN

### ONEPOINT COMMUNICATIONS

May 7, 1999

#### 1. Purpose

The intent of this plan is to provide a proposal that, upon implementation, would provide customers the ability to select the telecommunications carrier of their choice for routing their intraLATA toll calls.

#### 2. Implementation Schedule

OnePoint Communications will offer dialing parity for intraLATA toll, contingent on underlying provider provisioning while in a reseller mode, in all the exchanges and LATAs where OnePoint operates within 30 days of the Commission's approval of this plan.

#### 3. Carrier Selection Procedures

OnePoint Communications will, contingent on underlying RBOC (Regional Bell Operating Company) provisioning while in a reseller mode, implement the full 2-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and presubscribe to the same or a different participating telecommunications carrier, including their existing local exchange company, for all intraLATA toll calls. Orders for changes will be accepted and processed beginning on the implementation date.

OnePoint employees, or its agents, who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain the process to customers for making PIC changes for intraLATA toll calls. Customer Care Center personnel will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers in accordance with FCC and state commission rules and regulations. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers. OnePoint Customer Care Center personnel and other OnePoint employees and agents will respond to inquiries about intraLATA carriers in a competitively neutral fashion. OnePoint employees and agents will not discuss alternative carrier rates or service and will not provide customers with carrier identification codes or access code dialing instructions.

#### Existing Customers

Currently, OnePoint provisions intraLATA toll for existing customers by reselling an underlying RBOC's or SPRINT's usage service. On the date that intraLATA toll presubscription is implemented for OnePoint, customers may presubscribe to OnePoint Communications or any telecommunications carrier offering intraLATA toll service in their exchange. Customers will remain with OnePoint until they affirmatively choose an intraLATA toll carrier. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers directly to OnePoint, as their local exchange provider, through OnePoint's Customer Care Center or indirectly through their selected carriers. OnePoint, however, will not initiate or accept three-way calls from an alternative carrier in order to discuss presubscription.

Customers will be assessed a PIC change charge per OnePoint's tariff for changing their intraLATA carrier. When customers request a change in their interLATA and intraLATA carriers during one contact with the Customer Care Center and choose the same carrier for both jurisdictions, only one charge will be assessed. When customers request a change in their interLATA and intraLATA carriers during one contact with the Customer Care Center and choose different carriers for each jurisdiction, two charges will be assessed.

For a period of 90 days from initial implementation, customers will not be assessed an intraLATA PIC change charge for their initial intraLATA toll carrier choice. During the 90-day waiver period, a charge of one-half of the interLATA PIC change charge will be assessed when the intraLATA and interLATA carriers are changed to the same carrier during one contact with the Customer Care Center. Only the interLATA charge will be assessed when the intraLATA and interLATA carriers are changed to different carriers during one contact with the Customer Care Center during the waiver period.

If a OnePoint customer denies requesting a change in intraLATA toll providers as submitted by an intraLATA carrier, and the intraLATA carrier is unable to produce a Letter of Agency or other form of verification permitted by law, the intraLATA carrier will be assessed a charge for the unauthorized PIC change and the PIC will be changed per the customer's request. During the initial implementation 90 day waiver period, OnePoint will not market or actually offer an intraLATA PIC freeze option at anytime.

#### New Installation Customers

Customers who contact OnePoint requesting new telephone exchange service are being provided a list of telecommunications carriers available to provide interLATA service. Upon implementation of intraLATA toll presubscription, the customer will be provided a second list of carriers, including OnePoint, that provide intraLATA toll service in their exchange. The list of intraLATA toll carriers will be presented in a competitively neutral manner. Customers who do not make a positive choice for an intraLATA carrier will be identified within OnePoint's, or the underlying carrier's, system as "no-PIC" and will not be automatically defaulted to a carrier. Customers identified as "no-PIC" will be required to dial 10XXX to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier. OnePoint will refrain from automatically assigning intraLATA service for new customers to itself or to the customer's preferred interLATA carrier.

#### 4. Customer Education/Notification

Prior to implementation, customers will receive information in the form of a bill insert explaining their opportunity to select an intraLATA carrier within 30 days following implementation of intraLATA dialing parity. OnePoint anticipates that promotional strategies by carriers will contribute to customer awareness of intraLATA toll dialing parity. OnePoint will request that directory providers update their directories as new editions are published to reflect the opportunity for customers to choose an intraLATA toll carrier.

#### 5. Carrier Notification

Current interexchange carriers will be notified of OnePoint's intraLATA toll dialing parity implementation via letter reasonably in advance of the proposed implementation date. Carriers should provide a list of exchanges in which they plan to offer intraLATA toll service at least 60 days in advance of OnePoint's implementation date. OnePoint needs notification in advance to include the carrier on the list of participating carriers in each OnePoint exchange. Certified carriers who enter the market after implementation will be added to the list of participating carriers within 60 days of notifying OnePoint.

OnePoint will, upon request, provide subscriber listing information to carriers in "readily accessible" tape or electronic formats in a timely manner as requested through the processes that currently exists for the interLATA market. The process includes subscriber listing updates to carriers for new customers who choose that carrier or for existing customers of a carrier who revise their subscriber listing information. In addition, carriers can obtain complete subscriber listings in several formats in compliance with FCC Order No. 96-333, paragraph 389. All such information will be provided at cost to the requestor.

OnePoint will comply, contingent upon underlying provider cooperation while in a resale mode, with Part 51 of Title 47 of the CFR, Sections 305, 307, 325, 327, 329, 331, 333 and 335 in providing the required information and notice to the public of network changes. The notice will include network information as outlined in Section 327. The notice will be provided within the timeframes described in Sections 331-333.

## 6. Access to Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through OnePoint's underlying local exchange or interLATA carrier. No industry standard has been established for access to Operator services and Directory Assistance unique to the intraLATA carrier. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "411" for accessing the local exchange Directory Assistance and "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

Local and interLATA Operator Services and Directory Assistance may be branded by the underlying providers of local and interLATA service, as appropriate, based on the dialing pattern of the end user. Since no unique intraLATA dialing patterns currently exists in the industry, neither OnePoint, nor its underlying provider, is capable of identifying intraLATA calls to local or interLATA operators or directory assistance representatives.

## 7. Cost Recovery

Section 51.215 of Title 47 of the CFR, states that "a LEC may recover the incremental costs related to the implementation of toll dialing parity. OnePoint will file a cost recovery plan, including cost information and other necessary supporting documentation, not later than 270 days after intraLATA presubscription implementation to include a proposed recovery period and an annual true up procedure.